

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SOLAS OLED LTD.,

Plaintiff,

Case No. 6:19-cv-00236-ADA

v.

LG DISPLAY CO., LTD.,

LG ELECTRONICS, INC., and

SONY CORPORATION,

Defendants.

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff Solas OLED Limited and Defendants LG Display Co., Ltd., LG Electronics, Inc., and Sony Corporation jointly respectfully submit the attached proposed Protective Order for the Court's signature.

Respectfully submitted,

Dated: January 30, 2020

/s/ Reza Mirzaie

Marc Fenster
CA State Bar No. 181067
Reza Mirzaie
CA State Bar No. 246953
Neil A. Rubin
CA State Bar No. 250761
Kent N. Shum
CA State Bar No. 259189
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
Telephone: 310-826-7474
Email: mfenster@raklaw.com
Email: rmirzaie@raklaw.com
Email: nrubin@raklaw.com
Email: kshum@raklaw.com

Sean A. Luner
CA State Bar No. 165443
Gregory S. Dovel
CA State Bar No. 135387
Jonas B. Jacobson
CA State Bar No. 269912
DOVEL & LUNER, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, CA 90401
Telephone: 310-656-7066
Email: sean@dovel.com
Email: greg@dovel.com
Email: jonas@dovel.com

T. John Ward, Jr.
TX State Bar No. 00794818
Charles Everingham, IV
TX State Bar No. 00787447
Claire Abernathy Henry
TX State Bar No. 24053063
Andrea L. Fair
TX State Bar No. 24078488
WARD, SMITH & HILL, PLLC
PO Box 1231
Longview, Texas 75606
Telephone: 903-757-6400
Email: jw@wsfirm.com
Email: ce@wsfirm.com
Email: claire@wsfirm.com
Email: andrea@wsfirm.com

**ATTORNEYS FOR PLAINTIFF,
SOLAS OLED LTD.**

/s/ Gabriel S. Gross

Douglas E. Lumish
CA State Bar No. 183863
Gabriel S. Gross
CA State Bar No. 254672
Andrew M. Goldberg
CA State Bar No. 307254
LATHAM & WATKINS LLP
140 Scott Drive
Menlo Park, CA 94025
Telephone: 650-463-2628
Email: doug.lumish@lw.com
Email: gabe.gross@lw.com
Email: drew.goldberg@lw.com

Joseph H. Lee
CA State Bar No. 248046
LATHAM & WATKINS LLP
650 Town Center Drive, 20th Floor
Costa Mesa, CA 92626
Telephone: 714-755-8046
Email: joseph.lee@lw.com

Blake R. Davis
CA State Bar No. 294360
LATHAM & WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, CA 94111
Telephone: 415-395-8033
Email: blake.davis@lw.com

Jennifer H. Doan
TX State Bar No. 08809050
Joshua R. Thane
TX State Bar No. 24060713
Cole A. Riddell
TX State Bar No. 24105423
HALTOM & DOAN
6500 Summerhill Road, Suite 100
Texarkana, TX 75503
Telephone: 903-255-1000
Email: jdoan@haltomdoan.com
Email: jthane@haltomdoan.com
Email: criddell@haltomdoan.com

**ATTORNEYS FOR DEFENDANTS,
LG DISPLAY CO., LTD., LG
ELECTRONICS, INC., AND SONY
CORPORATION**

Gregory S. Gewirtz
NJ State Bar No. 006381992
Jonathan A. David
NJ State Bar No. 018981992
LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP
20 Commerce Drive
Cranford, NJ 07016
Telephone: 908-654-5000
Email: ggewirtz@lerner david.com
Email: jdavid@lerner david.com

**ATTORNEYS FOR DEFENDANT,
SONY CORPORATION**

CERTIFICATE OF SERVICE

I certify that the counsel of record who are deemed to have consented to electronic service are being served on January 30, 2020, with a copy of the Joint Motion for Entry of Protective Order via the Court's ECF system.

/s/ Reza Mirzaie